

EXHIBIT 2

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

PRECISION ASSOCIATES, INC., et al., on behalf of themselves and all others similarly situated,

Plaintiffs,

vs.

PANALPINA WORLD TRANSPORT (HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (JG) (VVP)

PLAINTIFFS' FIRST SET OF INTERROGATORIES

PROPOUNDING PARTY: **PLAINTIFFS**

RESPONDING PARTY: **JAPAN AIRCARGO FORWARDERS ASSOCIATION**

SET NUMBER: **ONE**

In accordance with Federal Rules of Civil Procedure 26 and 33, Plaintiffs hereby request that Japan Aircargo Forwarders Association answer the following interrogatories fully and separately in writing and under oath within 30 days of the date of service.

DEFINITIONS AND INSTRUCTIONS

Plaintiffs incorporate by reference all instructions and definitions stated in Plaintiffs' First Set Of Interrogatories to Kintetsu World Express, Inc. AND Kintetsu World Express (U.S.A.), Inc., dated October 18, 2013, and previously served on YOU, except that "YOU" OR "YOUR" refers to the entire corporate family to which these Interrogatories are sent. Here that means Japan Aircargo Forwarders Association. In addition, Plaintiffs include the following additional definitions and instructions:

1. As used herein, an “EMPLOYEE” of a specified entity means, without limitation, ANY PERSON that the specified entity employs OR employed during the RELEVANT TIME PERIOD, AND specifically includes ALL present AND former officers, directors, EMPLOYEES, servants, agents, independent contractors, consultants, AND representatives of the specified entity, AND ANY other PERSON acting OR purporting to act on behalf of the specified entity.

2. As used herein, “FREIGHT FORWARDING SERVICES” has the meaning given in ¶ 17 of Plaintiffs’ Corrected Third Amended Complaint AND includes services RELATING TO the organization of transportation of items via air AND ship AND can include related activities such as customs clearance, warehousing AND ground services. The providers of this package of services are sometimes referred to as “third party logistics providers,” OR “Freight Forwarders.” While air AND ocean freight forwarding services include ancillary truck AND rail services, “FREIGHT FORWARDING SERVICES” does not include transportation services related solely to truck AND/OR rail.

3. As used herein, “RELATING TO” a particular subject includes, without limitation, the following concepts: concerning, constituting, discussing, describing, reflecting, dealing with, pertaining to, arising from, analyzing, evaluating, estimating, constituting, studying, surveying, projecting, assessing, recording, summarizing, criticizing, reporting, commenting, containing, OR otherwise involving, in whole OR in part, directly OR indirectly, that particular subject. A DOCUMENT may “RELATE TO” a particular subject either when viewed alone OR when viewed in combination with other DOCUMENTS.

4. As used herein, “RELEVANT TIME PERIOD” means January 1, 2001 to January 4, 2011.

5. As used herein, “SURCHARGE” includes the surcharges, fees, AND rate increases described in Plaintiffs’ Corrected Third Amended Complaint, whether those Surcharges were charged separately OR as part of partial OR complete all-in rates, AND also includes ANY other surcharges, fees, OR rate increases imposed during the RELEVANT TIME PERIOD, whether those SURCHARGES were charged separately OR as part of partial OR complete all-in rates.

6. As used herein, “TRADE ASSOCIATION” means ANY group OR association, formal OR informal, RELATING TO FREIGHT FORWARDING SERVICES, including but not limited to Freight Forwarders Europe (“FFE”); Freight Forwarders International (“FFI”); Japanese Aircargo Forwarders Association (“JAFA”); BIFA (“British International Forwarders Association”); The Gardening Club (aka “Heathrow Gardening Club”, aka “Garden Club”); Spedlogswiss; Hong Kong Airfreight Forwarders Association (“HAFFA”); Shanghai International Freight Forwarders Association (“SIFFA”); Associazione Nazionale Agenti Merci Aeree (“ANAMA”); China International Freight Forwarders Association (“CIFA”); Thai Airfreight Forwarders Association (“TAFA”); AND members of the Yahoo Group as defined in Plaintiffs’ Corrected Third Amended Complaint (aka “logisticscommunity” OR recipients of emails from rmb_rates_china@yahoo.com).).

7. As used herein, an “AFFILIATE” of a specified PERSON OR entity means a PERSON OR entity that directly, OR indirectly through one OR more intermediaries, controls OR is controlled by, OR is under common control with, the specified PERSON OR entity. For purposes of this definition, “control,” “controls” OR “controlled by” signifies the possession, whether direct OR indirect, of the power to direct OR cause the direction of the management OR policies of a PERSON OR entity, whether through the ownership of voting securities, by contract OR otherwise.

8. As used herein, a "CARRIER" includes ANY PERSON OR entity that YOU, YOUR AFFILIATES, OR COMPETITORS use OR employ to provide some portion of air OR ship FREIGHT FORWARDING SERVICES but that does not contract directly with customers.

9. Unless otherwise specified, the RELEVANT TIME PERIOD, as defined above, applies to each of these requests.

INTERROGATORIES

INTERROGATORY NO. 1

IDENTIFY each AND every DOCUMENT production, whether formal OR informal, YOU, YOUR AFFILIATES, OR YOUR agents OR attorneys made to ANY government regulator in the world RELATING TO investigations of anticompetitive conduct in the FREIGHT FORWARDING SERVICES industry. For each identified production, state:

- (a) The regulator to which the production was made;
- (b) The date the production was made;
- (c) The volume of the production in terms of (1) number of DOCUMENTS, AND (2) number of pages;
- (d) The custodians whose DOCUMENTS were produced in the production;
- (e) If Bates-labeled OR otherwise numbered OR identified, the Bates ranges OR other identification of the production; AND,
- (f) The SURCHARGE(S), rate increase(s) AND fee(s) at issue in the production.

INTERROGATORY NO. 2

IDENTIFY each AND every presentation, whether formal OR informal, written OR oral, YOU OR YOUR agents OR attorneys made to ANY government regulator in the world RELATING TO investigations of anticompetitive conduct in the FREIGHT FORWARDING SERVICES industry. (For this Interrogatory, a "presentation" includes, but is not limited to,

ANY slide show prepared by Microsoft PowerPoint OR ANY similar computer software, OR ANY other video presentations, shown to ANY government regulator, AND ANY printout from such slide show OR other video presentation). For each presentation:

- (a) IDENTIFY the regulator to which the presentation was made;
- (b) State the date the presentation was made;
- (c) IDENTIFY ANY PERSONS involved in preparing OR creating the presentation, including but not limited to ANY PERSONS consulted regarding the content of the presentation OR whose DOCUMENTS were relied upon OR produced in connection with the presentation;
- (d) IDENTIFY ALL PERSONS present during ANY meeting RELATING TO ANY such presentation;
- (e) If Bates-labeled OR otherwise numbered OR identified, the Bates ranges OR other identification of ANY DOCUMENTS RELATING TO the presentation, including but not limited to the presentation, ALL notes AND drafts of the presentation, ALL DOCUMENTS relied upon OR referenced in the presentation, AND ANY communication from the regulator regarding the presentation; AND
- (f) The SURCHARGE(S), rate increase(s) AND fee(s) at issue in the presentation.

INTERROGATORY NO. 3

IDENTIFY each AND every PERSON AND entity that was a member of YOU OR YOUR AFFILIATES during the RELEVANT TIME PERIOD.

INTERROGATORY NO. 4

IDENTIFY ALL meetings of YOUR AND YOUR AFFILIATES' boards OR committees during the RELEVANT TIME PERIOD, in which U.S. FREIGHT FORWARDING SERVICES rates, SURCHARGES AND/OR fees were discussed. For each such meeting, IDENTIFY the

date AND, if applicable, the location; ALL PERSONS who attended OR participated; the subject matters discussed; AND ALL DOCUMENTS that reference, concern, OR were prepared at, for, OR as a result of such meetings. YOUR boards and committees for this Interrogatory include, but are not limited to YOUR:

- (a) Board of Directors;
- (b) Meeting Of Presidents And Vice-Presidents;
- (c) Executive Committee;
- (d) Administrators Meeting;
- (e) International Division;
- (f) Executive Board of International Division ("EBIC");
- (g) Business Improvement Committee;
- (h) Transportation Committee;
- (i) "Secretarial Bureau" OR "Administrative Agencies"; AND
- (j) AMS Working Group.

INTERROGATORY NO. 5

IDENTIFY ALL meetings of YOUR boards OR committees during the RELEVANT TIME PERIOD, other than the meetings IDENTIFIED in response to Interrogatory No. 4. For each such meeting, IDENTIFY the date AND, if applicable, the location; ALL PERSONS who attended OR participated; the subject matters discussed; AND ALL DOCUMENTS that reference, concern, OR were prepared at, for, OR as a result of such meetings.

INTERROGATORY NO. 6

IDENTIFY ALL meetings ANY of YOUR EMPLOYEES attended or were invited to, during the RELEVANT TIME PERIOD, at which U.S. FREIGHT FORWARDING SERVICES rates, SURCHARGES AND/OR fees were discussed, in addition to the meetings IDENTIFIED

in response to Interrogatories 4 to 5. For each such communication, IDENTIFY the date AND, if applicable, the location; ALL PERSONS who participated OR received the communication; the subject matters discussed; AND ALL DOCUMENTS that reference, concern, OR were prepared at, for, OR as a result of such communications.

INTERROGATORY NO. 7

IDENTIFY ALL communications during the RELEVANT TIME PERIOD, in which U.S. FREIGHT FORWARDING SERVICES rates, SURCHARGES AND/OR fees were discussed. For each such communication, IDENTIFY the date AND, if applicable, the location; ALL PERSONS who participated OR received the communication; the subject matters discussed; AND ALL DOCUMENTS that reference, concern, OR were prepared at, for, OR as a result of such communications.

INTERROGATORY NO. 8

IDENTIFY every PERSON or entity who served as an EMPLOYEE of YOU OR YOUR AFFILIATES during the RELEVANT TIME PERIOD.

INTERROGATORY NO. 9

IDENTIFY every individual, who served as an EMPLOYEE of YOUR OR YOUR AFFILIATES' Executive Board of International Committee (EBIC) during the RELEVANT TIME PERIOD.

INTERROGATORY NO. 10

IDENTIFY each of YOUR EMPLOYEES, OR those of YOUR AFFILIATES, that ANY government regulator in the world interviewed RELATING TO investigations of anticompetitive conduct in the FREIGHT FORWARDING SERVICES industry. For each PERSON interviewed, state the date, location, AND topics of the interview.

INTERROGATORY NO. 11

Describe each AND every action YOU OR YOUR AFFILIATES took, AND every policy YOU OR YOUR AFFILIATES adopted, to comply with OR to implement ANY order, directive or request from any government regulator in the world, including but not limited to the Japan Fair Trade Commission, RELATING TO investigations of anticompetitive conduct in the FREIGHT FORWARDING SERVICES industry.

Dated: March 7, 2014

s/ W. Joseph Bruckner

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UNITED STATES DISTRICT COURT
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PRECISION ASSOCIATES, INC.; et al, on behalf of themselves and all others similarly situated,

Plaintiffs,

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PANALPINA WORLD TRANSPORT (HOLDING) LTD., et al.,

Defendants.

Case No.: 08-CV-00042 (JG) (VVP)

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
COUNTY OF HENNEPIN) ss
)

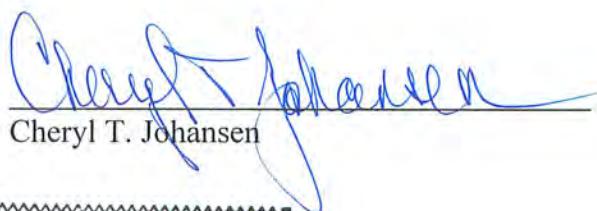
Cheryl T. Johansen, being duly sworn, states that on March 7, 2014, I served the following documents via e-mail on the parties detailed in the attached Service List:

1. PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO JAPAN AIRCARGO FORWARDERS ASSOCIATION; and
2. PLAINTIFFS' FIRST SET OF INTERROGATORIES TO JAPAN AIRCARGO FORWARDERS ASSOCIATION.

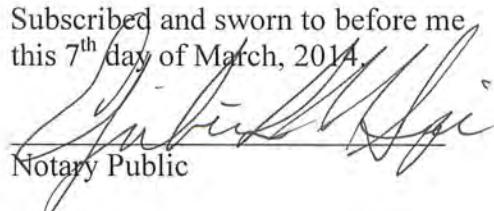
Additionally, these documents were served via U.S. mail, postage pre-paid on

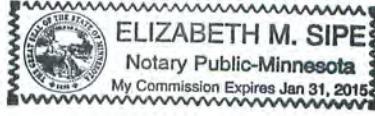
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*Counsel for Defendant Japan
Aircargo Forwarders Association*


Cheryl T. Johansen

Subscribed and sworn to before me
this 7th day of March, 2014.


Notary Public



SERVICE LIST

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